

EXHIBIT 19

From: [Rosenthal, Brian A.](#)
To: [Jim Etheridge](#); [IPTeam](#); [mark.waltfairpllc.com](#)
Cc: [Barry K. Shelton \(bshelton@sheltoncoburn.com\)](#); *** GDC-Dell WSOU
Subject: WSOU v. Dell -- 129 patent
Date: Friday, February 26, 2021 10:24:50 AM

Counsel,

In WSOU's Markman brief addressing the "initiating a poll . . ." term for 3 of the '129 patent, WSOU acknowledges that the plain and ordinary meaning of "the claim requires that the management station must be capable of initiating a poll in response to both 'reporting from the node' and 'a time interval being exceeded.'" As we explained during our meet and confers, we agree with this understanding. In view of our agreement, we would be willing to construe only the "management station" term of the phrase "initiating a poll of resources in the nodes of the network by the management station in response to reporting from the node or a time interval being exceeded" to mean "a management station that is capable of initiating a poll in response to both reporting from the node and a time interval being exceeded". Please let us know if you will stipulate to that agreed construction so that we can minimize the issues before the Court.

We request a response by close of business March 3.

Thanks,

Brian A. Rosenthal

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue, New York, NY 10166-0193
Tel +1 212.351.2339 • Mobile +1 703.989.7879
BRosenthal@gibsondunn.com • www.gibsondunn.com